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June 25, 2014

**VIA ECF**

Honorable Gregory H. Woods  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2260  
New York, NY 10007

Re: *James S. Chizmar v. CCL Industries Corp. et al.*  
Civil Action No. 14-cv-02182 (GHW)

Dear Judge Woods:

This firm represents Plaintiff James S. Chizmar. Pursuant to Rule 1E of your Honor's Individual Rules of Practice in Civil Cases, the parties respectfully submit this joint request for an extension of time for Defendant CCL Industries Corp. ("CCL"), Avery Products Corp. ("Avery Products") and Staples, Inc. ("Staples") (collectively "Defendants") to respond or otherwise move with respect to the complaint until July 15, 2014. The parties also jointly request a short adjournment of the initial pre-trial conference scheduled for July 8, 2014 at 10:45 a.m. [Doc. 4] until a date and time convenient for the Court after July 25, 2014.

The parties have been engaging in meaningful settlement discussions, and to date, the parties have exchanged settlement proposals. In light of these proposals, the parties jointly believe that a settlement can likely be reached in the near-term without the need for an initial pre-trial conference. There have been no prior requests to adjourn the initial pre-trial conference. The Defendants consent to this request.

The original date for the Defendants to respond or otherwise move with respect to the complaint was April 30, 2014. Pursuant to letter motions [Docs. 8 and 10], the Court granted extensions until May 30, 2014 for the Defendants to respond or otherwise move with respect to the complaint [Docs. 9 and 11]. Pursuant to additional letter motions [Docs. 19 and 21], the Court granted extensions until June 27, 2014 for the Defendants to respond or otherwise move with respect to the complaint [Docs. 20 and 22]. The presently requested date for Defendants to respond or otherwise move with respect to the complaint is July 15, 2014. The Defendants consent to this request.

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We thank the Court for its attention and courtesies, and we are at the Court's convenience if there are any questions.

Respectfully submitted,

*/Zachary D. Silbersher/*

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*Counsel for Plaintiff*

cc: Adrian Pruetz, Esq.  
*Counsel for Defendants*